

Administration and Internal Controls Made Easier for New Title I Directors

Spring Statewide Conference

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MASSACHUSETTS DEPARTMENT OF
ELEMENTARY AND SECONDARY
EDUCATION



Purpose

- ★ Offer suggestions on ways to improve efficiencies and implementation of Title I programs
- ★ Help ease the burden of administering the Title I grant
- ★ Share strategies that other Title I directors have used so you can learn from your peers
- ★ Define internal controls and provide quality examples



6 facts about Title I

- ★ Title I serves more than 18 million students nationwide
- ★ Title I was initiated in 1965 as part of the War on Poverty
- ★ Title I serves students Pre-K through 12th grade
- ★ Title I is the single largest pre-college federal education program
- ★ Title I students are found in almost every school district in the county
- ★ Title I is NOT just for low income students



Tip 1: Don't recreate the wheel

- ★ Our office has created templates for just about any required Title I document
- ★ Find them all here:
www.mass.gov/ese/titlei, click Title I, Part A
- ★ This is an excellent way to ensure each document contains all the requirements
 - ★ Supplement vs. Supplant policies
 - ★ Time and Effort reports (including stipends)
 - ★ Outreach letter to private schools



Tip 2: Go here first:

- ★ **Make sure you are listed as the Title I Director in Directory Administration**

<http://www.doe.mass.edu/InfoServices/data/diradmin/>

- ★ Title I handbook document extremely helpful for new directors: www.mass.gov/ese/titlei, click Title I, Part A

- ★ Title I website has a list of 13 major topics with resources: www.mass.gov/ese/titlei, click Title I, Part A, click Program Design



Tip 3: Document, document, document!

- ★ Document and save the work the district is doing:
 - ★ Outreach to parents/guardians
 - ★ Meeting agendas
 - ★ Meeting notes
 - ★ Sign-in sheets
 - ★ Important emails
- ★ Include date on documents when you revise them
- ★ Find a system that is simple and works for you



Tip 4: Your colleagues are a great source of information

- ★ There are opportunities to learn from and share information with your colleagues

- ★ Regional Networking Meetings

- ★ Title I Conferences

- ★ CACE (Council of Administrators for Compensatory Education)

- ★ ESE website lists all Title I Directors:

- <http://profiles.doe.mass.edu/search/search.aspx?leftNavId=11239>



Tip 5: Private school outreach

- ★ Use our website for a sample letter
- ★ When reaching out to private schools to inquire about their participation in Title I services:
 - ★ 1. Use email first
 - ★ 2. If no response, then send a letter by certified mail
- ★ Why?
 - ★ Email is free
 - ★ Emails and certified mail are simple to document



Tip 6: Common ways of getting parent input

- ★ PTO or Parent Council
- ★ School Council (which are required to have parents)
- ★ Parent surveys



Tip 7: Meet with your business manager/Use old money first

- ★ Meet regularly with your business manager
- ★ Grants have a two year life cycle
 - ★ FY17 grants can be spent July 1, 2016-June 30, 2018
 - ★ Though at least 85% of grant must be spent by 9/30/17
 - ★ If unspent after two years, the money could be returned to the federal government
- ★ Always make sure last year's funds get spent
- ★ Utilize the amendment process if necessary
- ★ Use FY16 money now!



Tip 8: Combine requirements

- ★ Title I requires parents to be notified that they have the right to know teacher and paraprofessional qualifications
- ★ Title I requires that a report card (overview) be sent to parents each year
- ★ Have ONE document for both requirements

- ★ See our website for an example

www.mass.gov/ese/titlei, click **Title I, Part A**, click **Program Review**, click **Tab 8**.



Internal control

- ★ Internal control is a process that is developed to provide reasonable assurance that the following categories of objectives will be achieved:
 - ★ the district's financial reporting will be reliable;
 - ★ the district will operate effectively and efficiently; and
 - ★ the district will comply with applicable laws, regulations, contracts and grant agreements.



Examples of good internal controls

- ✓ Equipment records – should indicate up to date equipment lists with accurate location information
- ✓ Procedures to draw down funds: should have procedures to draw down funds from ESE within the allowed time periods
- ✓ Title I set-asides: should show the allocation and distribution of funds from Title I set-asides
- ✓ Purchase orders: should indicate that an item or service was authorized prior to purchase



Examples of good internal controls

- ✓ Budget process – should have financial information that compares actual expenditures to the amounts budgeted (tracking by Business Manager)
- ✓ Grant workbook must align with budget expenditures – submit amendments as needed
- ✓ Payroll records / FTEs / time & effort reporting ~ should all reconcile



What is “necessary and reasonable”?

- ★ Is the relationship between the cost and an educational or administrative decision clear and straightforward?
- ★ Does the cost make sense given Title I requirements?
 - ★ Will the cost support the purpose of the Title I program
 - ★ Is the cost consistent with the school’s program design (SW / TA)?
 - ★ Does the cost comply with Title I fiscal rules? (e.g., supplement not supplant)?
 - ★ Can schools make effective use of whatever is being purchased? Can school staff explain how the item supports the Title I program?
 - ★ Would a reasonable person understand the cost?
 - ★ Can the cost be justified with data, research, or best practices?



Time and effort reporting

- ★ Districts must maintain auditable "time and effort" records that show how each Title I employee spent his/her compensated time.
- ★ Records are written & after-the fact
- ★ Time and effort records must be prepared by Title I staff with salary charged directly to:
 - ★ A federal award, multiple federal awards, or
 - ★ To any combination of a federal award and other state/federal sources.
- ★ Examples available on ESE website



Helpful resources

- ★ Your assigned liaison (see appendix)
- ★ Title I Website: www.mass.gov/ese/titlei
 - ★ Program Design
 - ★ Title I Handbook and Guidance
 - ★ Program Review
- ★ Email: titlei@doe.mass.edu
- ★ Phone: 781-338-6230
- ★ Your colleagues!

